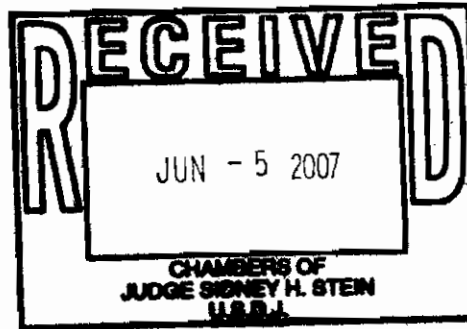


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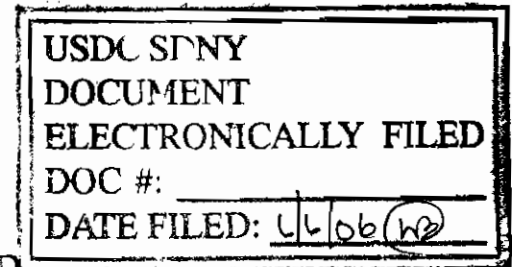


Michael J. Frevola
212 513 3516
michael.frevola@hklaw.com

June 5, 2007

BY HAND

Honorable Sidney H. Stein
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007-1312



MEMO ENDORSED

Re: North Offshore AS v. Rolv Berg Drive AS
SDNY Docket #: 07 Civ. 3095 (SHS)
Our File: 500177-03206

Honorable Sir:

We are counsel for plaintiff North Offshore AS ("North Offshore") in the referenced matter.

on or before June 11
We are writing in connection with North Offshore's request to file a Verified Second Amended Complaint, as well as for an amended order of maritime attachment which reflects the amended amount sought in the Verified Second Amended Complaint. As Rule 15(a) requires that a party may amend its pleadings only by leave of court after having once filed an amended pleading, we write to request such leave. As the defendant has not appeared to date, in the interest of reducing the burden on the Court we have made our application by letter.

It is well-settled that amendments under Rule 15(a) should be liberally granted when the movant shows good cause for the proposed amendment. Plaintiff's proposed Verified Second Amended Complaint is identical to its Verified Amended Complaint with the exception of adding an additional hire claim in the amount of \$296,980.00 which matured on May 25, 2007. While Plaintiff could commence a separate proceeding based on the new claim and then list this matter as a related claim subject to consolidation, the amendment proposed reduces the administrative burden without prejudicing the defendant.

6/5/07
Sordas
Silva
USO.S.

2 - Honorable Sidney H. Stein
June 5, 2007

We are grateful for Your Honor's consideration of Plaintiff's application, and we look forward to receiving Your Honor's decision in due course. For the ease of the Court, we have provided a "So Ordered" line below for Your Honor's endorsement in the event that the application is granted.

Respectfully submitted,
HOLLAND & KNIGHT LLP

By: 
Michael J. Frevola

MJF/mf

SO ORDERED:

U.S.D.J.

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